

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OKLAHOMA**

**IN RE:**

Michael Lynn Karr

§  
§ Case No. : 20-11610-M  
§  
§ Chapter: 7  
§  
**DEBTOR(S)** §

**MOTION TO SELL REAL PROPERTY AND  
NOTICE OF OPPORTUNITY FOR HEARING**

COME NOW the Debtor, **Michael Lynn Karr** by and through his attorney of record, Charles J. Kania of the **KANIA LAW OFFICE**, and pursuant to 11 U.S.C. §363(b)(1) and 11 U.S.C. §1303 and respectfully requests that this Court permit the Debtor to sell certain real property as described below, and under the terms indicated:

1. The Debtors propose to sell certain real property commonly known as: **17755 S 65<sup>th</sup> Ave. Tinley Park, IL 60477**. The property is further described as:

- a) Parcel 1: Lot 24 and Lot 25 (Except the North 11.514 Feet Thereof) All in Block 2 in Whitney and Bishops Addition to Tinley Park Plat of the Southeast ¼ of the North East ¼ of Section 31, Township 36 North, Range 15 East of the Third Principal Meridian, Town of Bremen, Cook County, Illinois Recorded December 26, 1899 as document No. 1393683, Also
- b) Parcel 2: That Part of the West Half of the heretofore vacated 14.00 Foot wide North and South Public Alley as Heretofore Dedicated in Block 2 in the Aforesaid Subdivision, Lying South of the Easterly Prolongation of the South Line of the North 11.514 Feet of Said Lot 25, Also
- c) Parcel 3: That Part of the North 21.182 Feet Of The Heretofore Vacated 178<sup>th</sup>

Street as Heretofore Dedicated in the Aforesaid Subdivision Lying East of the Southerly Prolongation of the West Line of Said Lot 24 and Lying West of the Southerly Prolongation of the Centerline of the Heretofore vacated 14.00 Foot Wide North and South Public Alley as Heretofore Dedicated in Block 2 in The Aforesaid Subdivision all in Cook County, Illinois.

2. The proposed sale price is \$ 190,000.00.
3. The buyer is Claudia Martinez and Francisco Diaz Perez. The buyer is not related to the Debtor by blood, marriage, or business association.
4. The following sales costs, liens of record, and other charges and expenses related to the sale, are to be paid out of the sale proceeds (at the time of closing) in the estimated amounts as indicated: (See Exhibit 1).

(a) \$ 6,450.50 as a realtor commission payable to Hoff Realtors.

\$ 3,107.50 as a realtor commission payable to Su Familia Real Estate, Inc.

(b) Recorded liens of record in the amounts as indicated:

(1) \$ 160,812.07 to Wells Fargo Mortgage Company.

(c) Other charges and expenses in the amounts as indicated:

(1) \$ 1,500.00 held by Real People Realty as Escrow,

(2) \$ 6,144.33 to County Taxes,

(3) \$ 5,700.00 as Seller Credit,

(4) \$ 1,985.00 Title – Owner's Title Insurance,

(5) \$ 50.00 to First American Title Insurance Closing Protection,

(6) \$ 3.00 to State of Illinois Owner's Policy Fee,

(7) \$ 125.00 to Commitment update search,

- (8) \$ 40.00 handling wire transfer fee,
- (9) \$ 95.00 County Document Transfer Tax,
- (10) \$ 190.00 State Documentary Transfer Tax,
- (11) \$ 297.60 Water Bill to Village of Tinley Park
- (12) \$ 3,500.00 Tinley Park Stamps to Tinley Park.

5. There shall be no net sale proceeds, after payment of the actual amounts charged to the times set forth in paragraph 4 above (and payment of other liens of record, taxes, and other costs and fees at closing).

6. The Debtors attach a copy of the Settlement Statement setting forth the terms of the sale.

#### **NOTICE OF OPPORTUNITY FOR HEARING**

**Your rights may be affected.** You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Northern District of Oklahoma, 224 South Boulder, Tulsa, Oklahoma 74103 no later than 14 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. The 14-day period includes the three (3) days allowed for mailing provided for in Fed. R. Bankr. P. 9006(f).

WHEREFORE, Debtors prays that this Court enter an Order allowing the sale of the above listed real property.

Dated: December 29, 2020

/s/ Michael Lynn Karr  
Michael Lynn Karr, Debtor

/s/ Charles J. Kania Counsel for Debtors  
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**CERTIFICATE OF SERVICE**

I, Charles J. Kania, hereby certify that on December 29, 2020, in addition to those parties served electronically through the CM/ECF system, a true and correct copy of this motion to sell property and notice of opportunity for hearing was sent via First Class Mail postage prepaid to the creditors on the attached official creditors' matrix.

/s/ Charles J. Kania  
Charles J. Kania